

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GEOTAG, INC.

Plaintiff,

v.

GIORGIO ARMANI S.P.A., ET AL.

Defendants,

Civil Action No. 2:10-cv-569

TJW

**PLAINTIFF'S ANSWER TO COUNTERCLAIMS OF
CONN'S APPLIANCES, INC. AND CONN'S INC.**

Plaintiff GEOTAG, INC. ("Geotag") answers Defendants CONN'S APPLIANCES, INC. AND CONN'S INC.'s ("Defendants") "Answer to Complaint and Counterclaims" (docket number 32) by corresponding paragraph number¹ as follows:

64. Admitted as to place of incorporation and place of business.

65. Admitted as to place of incorporation and place of business.

66. Admitted that Defendant purports to assert counterclaims for declaratory judgment under the Federal Declaratory Judgment Act. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.

67. Admitted as to personal jurisdiction.

68. Admitted as to venue.

69. Geotag reasserts its responses to paragraphs 64 to 68. To the extent necessary, Geotag denies the allegations contained in paragraphs 56 to 63 (affirmative defenses).

¹ Defendants begin their counterclaims at paragraph 64 on page 5 of their pleading. To enable the reader to more easily correlate the counterclaims and responses, Geotag adopts this numbering convention and therefore begins with paragraph 64.

70. Denied.

71. Denied.

72. Geotag reasserts its responses to paragraphs 64 to 71. To the extent necessary, Geotag denies the allegations in paragraphs 56 to 63 (affirmative defenses).

73. Denied.

74. Denied.

75. To the extent necessary, Geotag denies that Defendants are entitled to the relief requested in their prayer for relief. In addition, to the extent necessary, Geotag generally denies any allegations in the counterclaims not specifically admitted above, and Geotag realleges infringement, validity and damages, and denies any allegations in the counterclaims adverse to same.

PRAYER FOR RELIEF

WHEREFORE, Geotag respectfully requests that this Court enter judgment denying and dismissing Defendants' counterclaims, and that the Court enter judgment in favor of Geotag as requested in Geotag's complaint, as amended or supplemented.

May 9, 2011

Respectfully submitted,

COOPER & VAN CLEEF, PLLC

By: /s/ Charles van Cleef

Charles van Cleef

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ATTORNEYS FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

May 9, 2011

/s/ Charles van Cleef

Charles van Cleef